

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

AMY ANN PITTS,)
Petitioner,)
VS.) Civil Action No. 2:06cv1129-MEF
UNITED STATES OF AMERICA,)
Respondent.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO GOVERNMENT'S RESPONSE**

Comes now Petitioner Amy Ann Pitts, by and through counsel, and shows as follows:

1. On December 10, 2008, this Court entered an order allowing Petitioner Amy Ann Pitts, who at the time was appearing pro se, until January 17, 2008 within which to file a reply to the government's response in this case.
2. On the afternoon of January 9, 2008, the undersigned counsel was engaged to represent Petitioner Amy Ann Pitts in this matter.
3. The undersigned counsel will need time beyond January 17, 2008 to analyze the issues in this case and prepare a reply to the government's response.
4. The undersigned counsel has discussed this matter with opposing counsel, Assistant United States Attorney Sandra J. Stewart. Ms. Stewart has no objection to an extension of time for the undersigned counsel to file Petitioner Amy Ann Pitts' reply.

WHEREFORE, Petitioner Amy Ann Pitts moves this Court to allow her until January 31, 2008 within which to file her reply to the government's response.

s/ Thomas M. Goggans
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CERTIFICATE OF SERVICE

I hereby certify that I have on this the 10th day of January, 2008, electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of each of the following: Sandra J. Stewart.

s/ Thomas M. Goggans
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